

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<p>UNITED STATES OF AMERICA,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>LEBANESE CANADIAN BANK SAL, et al.,</p> <p style="text-align: center;">Defendants;</p> <p>ALL ASSETS OF LEBANESE CANADIAN BANK SAL OR ASSETS TRACEABLE THERETO, et al.,</p> <p style="text-align: center;">Defendants <u>in rem</u>.</p>	<p><u>VERIFIED CLAIM</u></p> <p>11 Civ. 9186 (PAE)</p>
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Judgment Creditors Deborah D. Peterson, Personal Representative of the Estate of James C. Knipple (Dec.), *et al.* (“Judgment Creditors”), by and through Judgment Creditors’ attorneys Salon Marrow Dyckman Newman & Broudy LLP, file this Verified Claim.

The Judgment Creditors assert a priority lien interest in the bank accounts identified in the Government’s Complaint (Docket No. 1) and the Government’s Amended Complaint (Docket No. 372), as more fully detailed below, based on, *inter alia*, the Judgment (as defined below) obtained by the Judgment Creditors in the United States District Court for the District of Columbia pursuant to 28 U.S.C. Section 1605(a)(7) on the basis of acts of terrorism. The Judgment was then recorded in various jurisdictions. (See Exhibit A). The Judgment Creditors possess a priority interest in the Defendants’ Property (as defined below).

Background

The Judgment Creditors are family members and representatives of the estates of the United States service persons killed in the October 23, 1983 terrorist bombing of a United States Marine Barrack in Beirut, Lebanon, as well as United States service persons wounded in that attack, which attack was orchestrated and carried out by Hezbollah, a terrorist organization. The Judgment Creditors obtained a judgment in the United States District Court for the District of Columbia (the “Judgment”) on September 7, 2007 in the amount of \$2,656,944,877.00. *See Peterson v. Islamic Republic of Iran*, 515 F. Supp. 25 (D.D.C. 2007). As of November 16, 2012, the entire Judgment remains due and owing to the Judgment Creditors, and interest and other costs and expenses, including, without limitation, legal fees, continue to accrue.

The Judgment Creditors Have a Senior Claim in the Defendant Properties

Pursuant to 28 U.S.C. Section 1605(a)(7) and applicable law, the Judgment Creditors, registered the Judgment with the United States District Court for the Southern District of New York on June 16, 2008, filed the Judgment with the Clerk of the County of New York, State of New York on June 16, 2008 (*See Exhibit B*), and filed the Judgment with the Clerk of the County of Queens, State of New York, on or about November 24, 2009 (*See Exhibit C*), all for the purpose of enforcement. Additionally, the United States District Court, Southern District of New York issued Writs of Execution, dated June 12, 2008 and October 17, 2008, which Writs were delivered to the Marshal for the Southern District of New York on June 12, 2008 and October 17, 2008, respectively. (*See Exhibit D*).

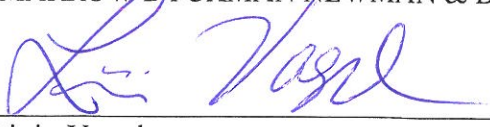
Defendant Properties Subject to Judgment Creditors' Claim

As a result of the foregoing, the Judgment Creditors assert a claim to all right, title and interest in the property listed in Schedule A of the Government's Complaint, attached hereto as Exhibit E, including, but not limited to: (i) all right, title and interest in correspondent, payable-through, or any other types of bank accounts opened or maintained for the benefit of the Lebanese Canadian Bank, Société Générale de Banque au Liban, Federal Bank of Lebanon, Middle East and Africa Bank, and/or BLOM Bank in the United States and namely within the Southern District of New York and made part of this *in rem* forfeiture action; (ii) all right, title and interest in bank accounts opened, held, or maintained in the United States and namely within the Southern District of New York by Hassan Ayash Exchange Company, Ellissa Exchange, Cymbar Swiss GMBH, LLC, STE Marco SARL, STE Nomeco SARL, and the Salhab Travel Agency; and (iii) all right, title and interest to any and all other assets, real or personal, that may be asserted in the Government's Amended Complaint filed on October 26, 2012, which as of November 16, 2012, is not publically available.

Dated: New York, New York
November 16, 2012

SALON MARROW DYCKMAN NEWMAN & BROUDY LLP

By: _____


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